

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MANUEL PANTOJA,

Plaintiff,

v.

PORTFOLIO RECOVERY  
ASSOCIATES, LLC,

Defendants.

No. 13-cv-7667

Honorable Robert W. Gettleman

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Manuel Pantoja ("Manuel") moves for Summary Judgment pursuant to Federal Rule of Civil Procedure 56. This Honorable Court should enter judgment for Manuel because there is no genuine issue of fact as to whether PRA's letter to Manuel was deceptive and misleading on its face. This conduct violates 15 U.S.C. §§1692e, 1692e(2), and 1692e(10). It further violates the Illinois Consumer Fraud And Deceptive Business Practices Act as it is an unfair and deceptive practice in violation of 815 ILCS 505/2. In support of this motion, Manuel has also filed a memorandum of law and his statement of material facts and uncontradicted deposition testimony, pursuant to Northern District of Illinois LR56.1(a)(3).

Respectfully Submitted,

By: \_\_\_\_s:/Matthew H. Hector\_\_\_\_

October 7, 2014

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